



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NEW YORK 10007

DANIEL M. BRAUN  
Senior Counsel  
dbraun@law.nyc.gov  
Phone: (212) 356-2659  
Fax: (212) 356-1148

MEMO ENDORSED

**By ECF**

August 4, 2022

Honorable Coleen McMahon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Granted -  
Coleen McMahon  
8/5/2022

Re: *Sierra, et al. v. City of New York, et al.*, 20-cv-10291 (CM)(GWG)  
*Wood v. City of New York, et al.*, 20-cv-10541 (CM)(GWG)

Your Honor:

I am a Senior Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and one of the attorneys representing Defendants in the above referenced matter. On July 22, 2022 (Dkt nos. 686, 687, 688, 689, 690, and 692), the *Sierra* and *Wood* plaintiffs filed a motion for leave to file an Amended and Consolidated Complaint. Pursuant to Your Honor's Individual Practice and Procedure V.F., defendants compute that they have until August 5, 2022 to file an opposition.<sup>1</sup> Defendants write with plaintiffs' consent to respectfully request an extension from August 5, 2022 until August 12, 2022 to file their opposition to plaintiffs' above-referenced motion for leave to amend and consolidate the *Sierra* and *Wood* complaints. This is defendants' first request for such an extension.

The above-referenced extension would require a corresponding extension of time for plaintiffs to file their reply papers. Upon information and belief, this extension would not impact any other scheduled deadlines in this matter.

<sup>1</sup> Relatedly, by letter motion dated July 22, 2022, plaintiffs moved to seal Exhibit 13 to their motion to amend and consolidate the *Sierra* and *Wood* cases, and plaintiffs requested in their letter that the Court deny their own motion (Dkt. 691). Defendants likewise computed that they had until August 5, 2022 to respond to plaintiffs' letter motion and out of an abundance of caution, apprised the Court accordingly (Dkt. 696). By Order dated August 3, 2022 (Dkt. 712), the Court *sua sponte* set August 12, 2022 by 5:00 p.m. as the deadline by which defendants are to respond.

Thank you for your consideration herein.

Respectfully submitted,

*Daniel Braun /s/*

Daniel Braun  
Senior Counsel  
Special Federal Litigation Division

cc: ALL COUNSEL (via ECF only)

A handwritten signature in dark ink, appearing to read "Daniel Braun", is written over a light blue horizontal line.